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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KENNETH EDWARD RAMIREZ,
Plaintiff,

vs.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

Case No. 1:20-cv-00985-EPG

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO SERVE
PLAINTIFF'S CONFIDENTIAL LETTER
BRIEF

(ECF No. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from June 11, 2021 to July 12, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S CONFIDENTIAL LETTER BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. Counsel requires additional time to brief the issues thoroughly for the Court's consideration.

1 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
2 and Court for any inconvenience this may cause.

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4 Respectfully submitted,

5 Dated: May 29, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

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7 By: /s/ Jonathan Omar Pena
8 JONATHAN OMAR PENA
9 Attorneys for Plaintiff

10 Dated: June 1, 2021

11 PHILLIP A. TALBERT
12 Acting United States Attorney
13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX
15 Social Security Administration

16 By: */s/ Marcelo N. Illarmo
17 Marcelo N. Illarmo
18 Special Assistant United States Attorney
19 Attorneys for Defendant
20 (*As authorized by email on June 1, 2021)
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ORDER

Based on the above stipulation, IT IS ORDERED that Plaintiff shall serve Defendant with Plaintiff's Letter Brief no later than July 12, 2021. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **June 2, 2021**

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE